

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In Re September 11 Liability Insurance
Coverage Cases

Case Number: 03-CV-0332 (AKH)

**UNOPPOSED MOTION TO ADMIT
COUNSEL
PRO HAC VICE**

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, John Eduard Barry a member in good standing of the bar of this Court, hereby move for an Order allowing the admission *pro hac vice* of:

Applicant's Name: Thomas W. Kirby
Firm Name: Wiley Rein LLP
Address: 1776 K Street, NW
City/State/Zip: Washington, DC 20006
Phone Number: (202) 719-7000
Fax Number: (202) 719-7049

Mr. Kirby is a member in good standing in the Bar of the District of Columbia.

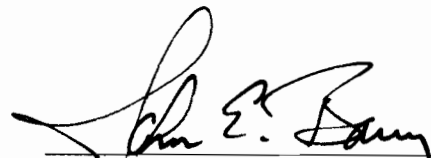
There are no pending disciplinary proceeding against him in any State or Federal court.

No party to the sanctions motion made any objection to the admission of Mr. Kirby when asked.

Dated: March 13, 2007

Respectfully Submitted,

City, State: Washington, DC



John Eduard Barry (JB-4529)
Wiley Rein LLP
1776 K Street, NW
Washington, DC 20006
Telephone: (202) 719-7000
Facsimile: (202) 719-7207

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In Re September 11 Liability Insurance
Coverage Cases

Case Number: 03-CV-0332 (AKH)

**AFFIDAVIT OF JOHN EDUARD BARRY
IN SUPPORT OF MOTION TO ADMIT
COUNSEL *PRO HAC VICE***

I, John Eduard Barry, being first duly sworn, depose and state as follows:

1. I am a partner at Wiley Rein LLP, counsel for Plaintiffs in the above-captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Plaintiffs' motion to admit Thomas W. Kirby as counsel *pro hac vice* to represent Wiley Rein LLP in connection with the sanction's issue in this matter.
2. I am a member in good standing of the bars of the District of Columbia and the States of California, Massachusetts (inactive) and New York, and was admitted to practice law in New York on March 2, 1987. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.
3. I have known Thomas W. Kirby since 1993.
4. Mr. Kirby is a partner at Wiley Rein LLP, in Washington, DC.
5. I have found Mr. Kirby to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.
6. Accordingly, I am pleased to move the admission of Thomas W. Kirby, *pro hac vice*.
7. I respectfully submit a proposed order granting the admission of Thomas W. Kirby, *pro hac vice*, which is attached hereto as Exhibit A.

WHEREFORE it is respectfully requested that the motion to admit Thomas W. Kirby, *pro hac vice*, to represent Plaintiffs in the above captioned matter, be granted.

The foregoing affidavit was signed and sworn
before me this 13th day of March, 2007.

Notary Public

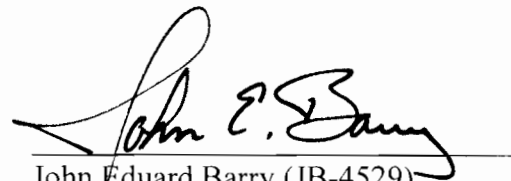
My commission expires:

Patty J. Wiles
September 14, 2009

Dated: March 13, 2007

City, State: Washington, DC

Respectfully Submitted,



John Eduard Barry (JB-4529)

Wiley Rein LLP

1776 K Street, NW

Washington, DC 20006

Telephone: (202) 719-7000

Facsimile: (202) 719-7207



District of Columbia Court of Appeals
Committee on Admissions
500 Indiana Avenue, N.W. — Room 4200
Washington, D. C. 20001
202 / 879-2710

I, GARLAND PINKSTON, JR., Clerk of the District of Columbia
Court of Appeals, do hereby certify that

THOMAS W. KIRBY

was on the 29TH day of DECEMBER, 1975
duly qualified and admitted as an attorney and counselor and
entitled to practice before this Court and is, on the date
indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have
hereunto subscribed my name
and affixed the seal of this
Court at the City of
Washington, D.C., on March
14, 2007.

GARLAND PINKSTON, JR., CLERK

By: 
Deputy Clerk

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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**[PROPOSED] ORDER FOR ADMISSION *PRO*
HAC VICE ON WRITTEN MOTION**

Upon the unopposed motion of John Eduard Barry, attorney for Wiley Rein LLP, and his
affidavit in support;

IT IS HEREBY ORDERED that

Applicant's Name:	Thomas W. Kirby
Firm Name:	Wiley Rein LLP
Address:	1776 K Street, NW
City/State/Zip:	Washington, DC 20006
Phone Number:	(202) 719-7000
Fax Number:	(202) 719-7049

is admitted to practice pro hac vice as counsel for Wiley Rein LLP with respect to the sanctions issue in
the above captioned case in the United States District Court for the Southern District of New York. All
attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules
governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system,
counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the pro
hac vice fee to the Clerk of Court.

SO ORDERED.

Dated: March 13, 2007

City, State: New York, New York

ALVIN K HELLERSTEIN
United States District Judge

CERTIFICATE OF SERVICE

I hereby certify that on this 15th day of March, 2007, I caused copies of the foregoing Motion for Admission *Pro Hac Vice* and supporting papers to be served via first-class mail on counsel identified below:

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Thomas W. Kirby